

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In Re:
DEBORAH L HEAD
CHARLES A HEAD

Chapter 13 Bankruptcy
Case No. 13-23982-GMH

NOTICE AND MOTION TO DISMISS - CONFIRMED PLAN

NOTICE IS HEREBY GIVEN that the Chapter 13 Standing Trustee, Mary B. Grossman, pursuant to 11 U.S.C. § 1307 (c), does hereby move the Court for an Order dismissing this case, for cause, including;

Failure to make payments as required by 11 U.S.C. § 1326.

Failure to provide the Chapter 13 Trustee with copies of the 2013 and 2014 income tax returns and failure to pay the Office of the Chapter 13 Trustee one-half of the net 2013 and 2014 tax refunds, if any.

The Trustee further moves for an Order authorizing the distribution of the funds being held by the Trustee pursuant to the confirmed Plan as and for adequate protection for the creditors.

ANY OBJECTION TO THE RELIEF REQUESTED BY THIS MOTION SHOULD BE IN WRITING SPECIFYING LEGALLY SUFFICIENT GROUNDS WHY THE MOTION SHOULD NOT BE GRANTED AND SHOULD BE FILED WITH THE CLERK OF THE U.S. BANKRUPTCY COURT, ROOM 126, U.S. COURTHOUSE, 517 EAST WISCONSIN AVENUE, MILWAUKEE, WISCONSIN 53202, WITHIN 21 DAYS OF THE DATE OF THE MAILING OF THIS NOTICE. SHOULD AN OBJECTION NOT BE IN COMPLIANCE WITH THESE REQUIREMENTS THE COURT MAY GRANT THE MOTION WITHOUT A HEARING. IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY ENTER AN ORDER GRANTING RELIEF.

Dated January 21, 2016 at Milwaukee Wisconsin.

/s/ _____
Mary B. Grossman, Chapter 13 Standing Trustee
Robert W. Stack, Staff Attorney
Christopher D. Schimke, Staff Attorney
Sandra M. Baner, Staff Attorney
P.O. Box 510920
Milwaukee, WI 53203
(414) 271-3943